

Exhibit “A”

Courtney Ehrhart

From: Allison Doucette
Sent: Thursday, January 28, 2016 2:45 PM
To: John Anthony; Courtney Ehrhart
Subject: This was my draft e-mail that was not sent due to early maternity leave -- Savannah/Martino - Follow up on Discovery - Good Faith Conference - Follow Up on Mediation
Attachments: Savannah Capital_Martino, Thomas S. - (Doc 37) - Martino Amended Responses to RFP.pdf

Lee,

I would like to follow up on the Debtor's discovery responses. We have not received the documents that the Debtor agreed to produce. Please advise when and in what form we can receive those. I am available to review and pick them up next week if they are at your office, etc.

Additionally, most of the requests were objected to. We do not believe the objections are well taken and intend to file a motion to compel. Please let us know if you will agree to any resolution of the objections.

Finally, the judge ordered us to mediation. I think the goal was to obtain the information from the discovery prior to attending mediation so that we could have a more productive process. The current deadline is January 15, 2015. Please advise as to when we can expect the discovery responses so that we can come up with a realistic timeframe for moving the mediation deadline with the Court.

I look forward to hearing from you.

Thanks,
Allison

Allison Doucette, Esq.
ANTHONY & PARTNERS, LLC
201 N. Franklin Street, Suite 2800
Tampa, Florida 33602
Direct 813.273.5611
Office 813.273.5616
Fax 813.221.4113
anthonyandpartners.com

This e-mail is intended only for the individual(s) or entity(s) named within the message. This e-mail might contain legally privileged and confidential information. If you properly received this e-mail as a client or retained expert, please hold it in confidence to protect the attorney-client or work product privileges. Should the intended recipient forward or disclose this message to another person or party, that action could constitute a waiver of the attorney-client privilege. If the reader of this message is not the intended recipient, or the agent responsible to deliver it to the intended recipient, you are hereby notified that any review, dissemination, distribution or copying of this communication is prohibited by the sender and to do so might constitute a violation of the Electronic Communications Privacy Act, 18 U.S.C. section 2510-2521. If this communication was received in error we apologize for the intrusion. Please notify us by reply e-mail and delete the original message without reading same. Nothing in this e-mail message shall, in and of itself, create an attorney-client relationship with the sender.

Disclaimer under Circular 230: Any statements regarding tax matters made herein, including any attachments, are not formal tax opinions by this firm, cannot be relied upon or used by any person to avoid tax penalties, and are not intended to be used or referred to in any marketing or promotional materials.